

III. REMARKS

Claims 1-26 remain pending. Claims 1-6, 9-11, 13-16, 18-23 and 26 are rejected under 35 U.S.C. 103(a) as being allegedly unpatentable by Angel et al., US 2002/0133392 A1 (Angel). Claims 7-8, 12, 17, and 24-25 are rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Angel in view of Pope et al., US 2003/0055737 A1 (Pope). Applicants have herein amended claims 1, 10 and 18. No new matter is believed added.

Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the claims in a subsequent patent application that claims priority to the instant application.

With regard to independent claim 1 (and similarly claims 10 and 18), Applicants submit that Angel fails to teach each and every feature presented in the claim. Initially, Applicants point out that Angel teaches a content steering engine (see, e.g., Figure 1) that is used to steer an end user to content in a distributed network to address an existing issue (i.e., it provides on-line customer support). Angel does not teach a case management system for managing customer cases. Angel merely provides a system for submitting queries and retrieving content from one or more disparate providers (see, e.g., claim 1). In the Office Action, the Office responds to this argument by Applicants by citing the definition of the word “case” as including an investigation, and arguing that in Angel, investigation is being performed on the customer service provider. Office Action, p. 13. Applicant respectfully submits that such a broad characterization of the Angel system is stretching the limits of the English language. As discussed below, Angel does not disclose a case management system as claimed by the claimed invention.

In contrast to Angel, Applicants provide a system that can manage cases, and includes, *inter alia*, a compliance tracking system that retrieves previously loaded customer compliance data from a database; wherein the compliance data consists of information related to whether a customer has met certain pre-set goals set by the CRM system.

In the Office Action, the Office states that the call center customer database disclosed by Angel includes “customer compliance” information because “data such as the product used by customer, and problems experienced by customer has an effect and/or relates to a customer meeting *his or her goals* by being escalated or deescalated into a session.” Office Action, p. 14, emphasis added. Applicant continues to disagree with the Office’s interpretation of what is considered “compliance information” as claimed in the claimed invention. Again, Applicant has amended the claims to provide further clarification that the goals that must be met to indicate compliance in the claimed invention are the goals that are set by the CRM system itself, not the user’s goals as the Office acknowledges is the case in Angel.

Moreover, as recited in claim 10 (and similarly claims 1 and 18), the present invention provides “displaying a compliance indicator when the customer case management page is viewed.” In the Office Action, the Office states that this compliance indicator “is represented by the actual CRM system being executed in the particular dialog state specified...” Office Action, p. 14. The Office cites to para. [0059] for support for this argument. However, para. [0059] of Angel simply discloses ways in which a user’s call center question may be escalated from an automated system to a human customer service representative.

The Office further alleges that the “compliance indicator” of the claimed invention is taught in paragraph 0087 of Angel, as “an exit node indicator on the customer session page.” Again, Applicants respectfully traverse this interpretation of Angel. The exit node indicator of

Angel simply identifies when a user has a customer service issue that has been routed to the wrong automated system, or wrong customer service representative. As the example in Angel indicates, if a user with a Dell PC calls, he will be routed to the Dell knowledge map. However, if the Dell PC user's issue is actually with his HP printer, an exit node would be triggered and his session would be transferred to the HP knowledge map. This routing of calls to the correct knowledge map is not equivalent to the indicator of the claimed invention which displays whether a user has met pre-set goals as set by the CRM system. As discussed above, Applicants respectfully disagree with the Office's argument that the fact that a customer is operating a particular hardware or software operating system represents customer compliance. Compliance, as claimed in the amended claims, is narrower than simply anything relating to the customer's system.

Further, the system of Angel does not teach displaying a compliance indicator on the customer case management page. Even if, *arguendo*, one did interpret an exit node as a compliance indicator, nowhere does Angel teach displaying the exit node in a customer case management page. Instead, Angel explicitly discloses a dialog that *seamlessly* transfers a user from one web site to another while the user looks to obtain help (see, e.g., para. 0081). In other words, a user of Angel's system is not even aware that a particular item in a dialog is going to send them to a different web site until after they click on the link. Thus, such an item cannot possibly, under any reasonable interpretation, be interpreted to indicate compliance. The Office states that it would have been obvious to one of ordinary skill in the art "to view all cases opened for a given customer with the motivation of allowing retrieval of case information for an entity connected to the immediate network." 7/26/07 Office Action, p. 4. Notwithstanding whether this is true or not, Applicants respectfully submit that this is not the same as displaying a

compliance indicator on a customer case management page. The Office seems to imply that viewing all cases for a particular customer is equivalent to a compliance indicator. Applicants respectfully disagree. As discussed above, the compliance indicator of the claimed invention displays information processed by the compliance tracking system. It is not simply a recitation of all open cases for any given customer.

Accordingly, Applicants submit that for these reasons, claims 1, 10, 18 are not unpatentable over Angel.

Each of the claims not specifically addressed herein is believed allowable for the reasons stated above, as well as their own unique features. The secondary reference, Pope, fails to remedy the aforementioned deficiencies found in Angel.

Applicants respectfully submit that the application is in condition for allowance. If the Examiner believes that anything further is necessary to place the application in condition for allowance, the Examiner is requested to contact Applicants' undersigned representative at the telephone number listed below.

Respectfully submitted,

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